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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

BAKER RANCHES, INC., a Nevada
 Corporation, DAVID JOHN ELDRIDGE
 AND RUTH ELDRIDGE, as Co-Trustees of
 the DAVID JOHN ELDRIDGE AND RUTH
 ELDRIDGE FAMILY LIVING TRUST, dated
 January 31, 2007; ZANE JORDAN; and JUDEE
 SCHALEY,

Plaintiffs,

v.

DEB HAALAND, in her official capacity as
 Secretary of the United States Department of
 the Interior, the UNITED STATES
 DEPARTMENT OF THE INTERIOR,
 SHAWN BENGE, in his official capacity as
 Acting Director of the National Park Service,
 the NATIONAL PARK SERVICE, and
 ANITA HANSEN, in her official capacity
 as Acting Superintendent of Great Basin National
 Park.¹

Defendants.

Case No. 3:21-cv-00150-GMN-CSD

**STIPULATION AND PROPOSED
 ORDER TO EXTEND THE DEADLINES
 FOR RESPONSES AND REPLIES TO
 MOTIONS TO DISMISS AND TO
 REMAND
 (SECOND REQUEST)**

Defendants Deb Haaland, United States Department of the Interior, Shawn Benge, National
 Park Service and Anita Hansen (“Defendants”), and Plaintiffs Baker Ranches, Inc., David John
 Eldridge and Ruth Eldridge, as Co-Trustees of the David John Eldridge and Ruth Eldridge Family
 Living Trust, dated January 31, 2007, Zane Jordan, and Judee Schaley (collectively, “Plaintiffs”), per

¹ Great Basin National Park Superintendent James Woolsey retired in August 2023. Anita Hansen is the Acting Superintendent.

1 LR IA 6-1, respectfully stipulate to extend the deadlines for Defendants' response to Plaintiffs'
2 Renewed Motion to Remand (ECF No. 68), Plaintiffs' response to Defendants' Motion to Dismiss
3 (ECF No. 67) (collectively, "Motions"), and the parties' replies in support of their respective Motions,
4 as follows:

5 1. This is the second stipulation for extension of time related to the parties' Motions.

6 2. On December 12, 2023, Defendants filed a Motion to Dismiss (ECF No. 67) and
7 Plaintiffs filed a Renewed Motion to Remand (ECF No. 68) pursuant to this Court's October 16, 2023
8 minute order (ECF No. 60) and October 26, 2023 Order to Extend Deadlines (ECF No. 64). Per the
9 Court's October 26, 2023 Order to Extend Deadlines (ECF No. 64), responses in opposition to these
10 Motions are currently due January 19, 2024, and replies in support of these Motions are due February 9,
11 2024.
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13 3. In late December 2023, Defendants' counsel was asked and agreed to attend a four-week
14 trial in the U.S. Court of Federal Claims set for January 16, 2024 to February 6, 2024, in order to assist a
15 trial team which was unexpectedly short a person. Defendants' counsel discussed this development with
16 Plaintiffs' counsel, and the parties agreed a mutual and moderate extension of certain deadlines in this
17 action was warranted.
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1 4. Thus, the parties represent that this stipulation is made in good faith and not for the
2 purpose of delay, and that good cause exists to extend the briefing schedule on the Motions as follows:

3 Responses in opposition to Motions: February 9, 2024; and

4 Replies in support of Motions: March 1, 2024.
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6 Respectfully submitted January 8, 2024.

7 /s/ Debbie Leonard

8 DEBBIE LEONARD (Nevada Bar No. 8260)

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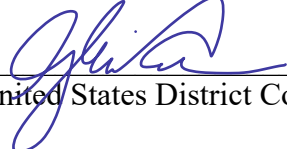
15 /s/ Katharine Laubach

16 Katharine Laubach (Colorado Bar No. 42693)

17 Attorneys for Defendants

18 **ORDER**

19 **IT IS SO ORDERED.**

20 
21 United States District Court Judge

22 DATED this 8 day of January, 2024.
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